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2001 JUL

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6-25-2001

Document Control Office (7407)
Office of Pollution Prevention and Toxics (OPPT)
Environmental Protection Agency
1200 Pennsylvania Ave., NW.
Washington, DC 20460

RECEIVED
OPPT/TOXIC
2001 JUL 29 AM 10:56

Re: OPPTS-00274D; Voluntary Children's Chemical Evaluation Program (VCCEP)

Dear Sirs,

This letter signifies CONDEA Vista Company (CVC) commitment to sponsor three (3) chemicals in the first tier of the US Environmental Protection Agency's Voluntary Children's Chemical Evaluation program (VCCEP) pilot program. The chemicals we are sponsoring are:

Decane (124-18-5)
Undecane (1120-21-4)
Dodecane (112-40-3)

CVC recognizes that this sponsorship entails the collection and/or development of tier 1 level VCCEP health effects and exposure information on these chemicals and a "Data Needs Assessment" discussing any additional data needed for the purposes of the program. We will begin this data collection process no later than December 26, 2001.

We will make every effort to make the Tier 1 submissions for these chemicals in a timely fashion. The Agency should note that different countries have sponsored all these chemicals under the OECD SIDS Program and the assessments are still being developed. In order to avoid a large duplication of effort, we intend to utilize the information being developed under the OECD SIDS program. As such, the timing for submission of the VCCEP tier 1 data will be affected by these ongoing activities. Because of these timing concerns, we are unable to provide a submission date as requested by the FR notice.

We look forward to working with the Agency in making this effort a mutual success. In addition to a spirit of cooperation, CVC believes that there are several other factors that are critical to achieving success in this regard. First of all, the peer consultation processes must be science-based, first and foremost. This will ensure that all interested parties can trust this process and its results. Furthermore, explicit recognition must be given that manufacturers of the pilot chemicals cannot be expected to account for exposures that are beyond their control.

Contain NO CBI

Our technical contact for this effort is,

Dr. Dave Penney
CONDEA Vista Company
900 Threadneedle
Houston, TX 77079
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281-588-3478 (fax)
dave.penney@us.sasol.com

Sincerely,

Mr. Tom Grumbles, CIH
Manager, Product Safety and Occupational Health